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April 28, 2008

By Facsimile Transmittal (212) 805-7948

Honorable Richard J. Holwell United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED:

Tran Dinh Truong, individually and on behalf of Alphonse Hotel Corp. d/b/a Hotel Carter v. New York Hotel & Motel Trades Council, AFL-CIO, The Office of the Impartial Chairman and Peter Ward, Case No. 1:07-Civ-11383 (RJH)

Dear Judge Holwell:

My firm represents Plaintiff in the above referred matter. I am writing this letter to respectfully request an extension of the deadlines, pursuant to the Scheduling Order filed March 14, 2008, for Plaintiff's opposition to: (i) the Union's and Peter Ward's motion for judgment on the pleadings; (ii) the Impartial Chairman's motion for judgment on the pleadings; and (iii) the Union's motion for sanctions.

This request is predicated on the fact that a number of personal events, coupled with a junior associate's temporary medical leave, has resulted in a backlog of work for my office and, notably, myself. As such, I respectfully request that the due dates for Plaintiff's opposition papers to all three (3) motions be extended to May 15, 2008. Of course, the Defendants' reply may be extended accordingly. Reply By MAY 23, 2008

Should you have any questions or comments, please feel free to contact me.

Thank you for Your Honor's consideration in this matter.

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Respectfully yours,

Cathy O'Donnell

(CO0973)

CALABRO & ASSOCIATES, P. C.

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